

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND-ODESSA DIVISION

JENNIFER VETRANO,	§	
	§	
Plaintiff,	§	
	§	
v.	§	
	§	Civil Action No.
JOHN BRDA, ALLISON CHRISTILAW,	§	
MBA, ICD.D B, JOHN R. HARDING,	§	
UZI SASSON, DAN EATON ESQ,	§	7:24-CV-00325-DC-RCG
MAURICE GUITTON, ERIC M. LESLIE,	§	
PHILIPPE MORALI, KEN HANNAH,	§	
STEEN KARSBO, JOHN DOES 1-20,	§	
JANE DOES 1- 20,	§	
	§	
Defendants.	§	

**DEFENDANT KEN HANNAH’S
UNOPPOSED MOTION TO EXTEND PLEADING DEADLINE**

Defendant Ken Hannah (“Hannah”), without waiver of his contention that this Court lacks personal jurisdiction, files this unopposed motion seeking an extension of his deadline to move, answer, or otherwise respond to Plaintiff’s Amended Complaint [ECF No. 3] until June 16, 2025, which is consistent with the extension granted to co-Defendants John Brda [*see* ECF No. 8] and Allison Christilaw [*see* ECF No. 41]. In support of this Motion, Hannah respectfully shows the Court as follows:

1. Plaintiff filed a Complaint on December 9, 2024. [ECF No. 1] This Complaint did not name Hannah as a defendant.
2. Plaintiff filed an Amended Complaint, spanning nearly 70 pages and 277 paragraphs, against dozens of defendants, with at least 7 causes of action on December 27, 2024. [ECF No. 3] This Amended Complaint added Hannah as a defendant.

3. On February 10, 2025, Plaintiff requested an issuance for summons [ECF No. 4], which was issued on February 13, 2025. [ECF No. 5] On March 26, 2025, Hannah was served with the Amended Complaint, and so his deadline to move, answer, or otherwise respond to the Amended Complaint is currently April 16, 2025.

4. There is good cause, pursuant to Federal Rule of Civil Procedure 6(b), for an extension because on February 26, 2025, the Plaintiff requested a 90-day extension of time to serve the summons on certain other defendants [ECF No. 6], which the Court granted. Based on the Court's docket, Hannah believes other defendants remain to be served.

5. Additionally, Plaintiff was unopposed to an extension to respond to the Amended Complaint by other defendants, Defendant John Brda [ECF No. 8] and Defendant Allison Christilaw [ECF No. 41], which the Court granted, extending John Brda's and Allison Christilaw's response deadlines to June 16, 2025.

6. Further, undersigned counsel is aware of at least three other matters pending before your Honor where no responsive pleadings have been filed, with common parties, and common questions of law and fact, which include the following:

- *Willcot v. SEC, et al.*, No. 7:24-cv-317 (W.D. Tex. Dec. 6, 2024);
- *Spears v. Next Bridge Hydrocarbons Inc., et al.*, No. 7:24-cv-321 (W.D. Tex. Dec. 6, 2024); and
- *Pease v. SEC, et al.*, No. 7:24-cv-322 (W.D. Tex. Dec. 9, 2024).

7. Good cause for this extension is made because it would assist in the efficient presentation to the Court of Hannah's defenses, along with the other defendants, and promote judicial economy.

8. Accordingly, Hannah respectfully requests that the Court extend his deadline to move, answer, or otherwise respond to Plaintiff's Amended Complaint to June 16, 2025.

9. This is Hannah's first request for an extension of time.
10. This extension is not sought for purposes of delay, but so that justice may be done.
11. Undersigned counsel conferred with *pro se* Plaintiff. Plaintiff stated she is unopposed to the requested extension.

Dated: April 11, 2025

Respectfully submitted,

NORTON ROSE FULBRIGHT US LLP

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CERTIFICATE OF CONFERENCE

Pursuant to the Western District of Texas's Local Civil Rule CV-7(G), the undersigned hereby certifies that, as counsel for Defendant Hannah, he conferred with Plaintiff Jennifer Vetrano via email. Plaintiff has indicated that she is not opposed to the extension requested herein.

/s /James V. Leito IV

James V. Leito IV

CERTIFICATE OF SERVICE

This foregoing pleading was served on all counsel of record in compliance with Rule 5 of the Federal Rules of Civil Procedure on April 11, 2025.

/s /James V. Leito IV

James V. Leito IV